

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JERMAINE DOCKERY, ET AL.

PLAINTIFFS

VS.

CIVIL ACTION NO.: 3:13-CV-00326(TSL)(JCG)

RICHARD B. MCCARTY, ET AL.

DEFENDANTS

DENNIS E. HUGGINS, JR. DECLARATION

Pursuant to 28 U.S.C. § 1746, I, Dennis E. Huggins, Jr. testifies as follows:

1. My name is Dennis E. Huggins, Jr. I am over twenty-one (21) years of age, and have personal knowledge of the facts set forth herein. I have my Ph.D and am employed as Director of Mental Health at the East Mississippi Correctional Facility ("East Mississippi Correctional Facility").

2. EMCF Management and Training Corporation Officers ("MTC Officers") receive mental health training. In particular, MTC Officers take courses on Mental Health Awareness, Counseling Techniques, Suicide Prevention, Substance Abuse, and the Prison Rape Elimination Act. Additionally, MTC Officers are briefed daily on security and mental health issues. Because EMCF is a psychiatric facility, MTC Officers are trained on various techniques needed to support EMCF inmates. Each year, MTC Officers take courses concerning mental health as part of their "In-House- Service Training."

3. During the Counseling Techniques course, MTC Officers are taught what it means to counsel inmates, including but not limited to, identifying proper techniques of communication that should be used during a counseling session with an inmate, identifying common errors made during a counseling session, and identifying the importance of following up with inmates. They also receive training on the most commonly used counseling techniques

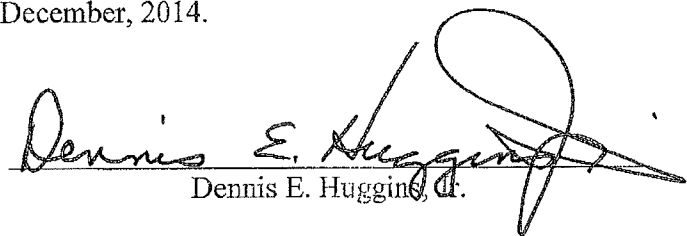
in the correctional environment: directive counseling, elective counseling, and a combined method. MTC Officers also are encouraged to engage in active listening when interacting with inmates and taught to take body language into account during these interactions. MTC Officers are instructed to use a calm voice, think before they speak, and attempt to reduce friction between themselves and the inmates, particularly those with mental illness.

4. MTC Officers additionally receive training on suicide prevention and intervention. They specifically learn that the most important aspect of suicide prevention is human interaction and good interpersonal communication. MTC Officers learn the factors that make inmates more vulnerable to suicide behavior, including, among other things, depression impulsiveness, prior suicidal history, alcohol and drug abuse, and severe guilt and shame. MTC Officers are taught to recognize the signs of depression such that they can share this information with an affected inmate's mental health counselor. They additionally are advised to use their authority positively, to admit mistakes, be consistent, take with inmates, be a role model to other officers, and to demonstrate honesty and sincerity.

5. MTC Officers are provided a thorough overview of the various major mental illnesses found within the inmate population and receive guidance on how best to interact with inmates with these various diagnoses.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on this the 15th day of December, 2014.


Dennis E. Huggins